

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:

Reginald Wise and
Barbara Wise

Case No. 17-29743-svk

Chapter 13

Debtor(s).

NOTICE AND REQUEST TO AMEND UNCONFIRMED CHAPTER 13 PLAN

The above referenced Debtor(s) filed papers with the Court requesting amendment of the unconfirmed Chapter 13 plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to confirm the amended plan as proposed, or if you want the Court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the Court a written request for hearing that contains a short and plain statement of the factual and legal basis for the objection. File your written request electronically or mail it to:

Clerk of Bankruptcy Court
517 E. Wisconsin Avenue
Room 126
Milwaukee, WI 53202-4581

If you mail your request to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the expiration of 21 days.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and enter an order confirming amended Chapter 13 plan.

*Attorney Richard A. Check
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Milwaukee, WI 53202
(414) 223-0000
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REQUEST TO AMEND UNCONFIRMED CHAPTER 13 PLAN

1. This request to amend an unconfirmed Chapter 13 plan **SUPERSEDES ALL PRIOR REQUESTS TO AMEND THE PLAN AND INCLUDES ALL PROPOSED AMENDMENTS. TERMS NOT FULLY STATED HERE OR IN THE ORIGINAL PLAN ARE NOT PART OF THE PLAN.**
2. Service. A certificate of service must be filed with the amendment. Designate one of the following:
 - ☒ A copy of this proposed amendment has been served on the trustee, United States trustee and all creditors, or
 - ☐ A motion requesting limited services is being filed simultaneously with the Court.
3. The Chapter 13 Plan filed with the Court is amended as follows:

*Debtors wishes to pay the City of Milwaukee on their secured claim @ 12% interest through the Chapter 13 plan.

*** Proposed Treatment of IRS Secured Tax Claim:** Debtors shall pay \$100 per month through the plan towards their secured tax lien obligation, which matches their current agreement with the IRS as negotiated prior to the filing of the bankruptcy case. Any amounts remaining after Debtors' plan is completed shall be non-dischargeable, and the remaining balance paid by the Debtors directly to the IRS in full by agreement of the parties in a timely manner.

All remaining terms of the original Chapter 13 Plan are unaffected. In the event of a conflict between the terms of the original Plan and the terms of this amendment, the terms of this amendment control.

WHEREFORE, each Debtor requests that the Court approve this proposed amendment to the original Chapter 13 Plan.

CERTIFICATION

The Debtor's attorney must sign this certification. A Debtor represented by an attorney may sign this certification. If the Debtor does not have an attorney, the Debtor must sign this certification.

The provisions in this Chapter 13 plan are identical to those contained in the official local form other than the changes listed in part 3.

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I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted April 4, 2018.

/s/: Samuel Check

Samuel Check

Paralegal to Attorney Richard A. Check

/s/ Richard A. Check

Attorney Richard A. Check

Attorney for the Debtor(s)

Bankruptcy Law Offices of Richard A. Check

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice and Request to Modify Chapter 13 plan were mailed First Class to persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on April 4, 2018.

*See attached creditor matrix

Additionally, the documents referenced above were also served via electronic means on the following individuals on April 4, 2018:

United States Trustee Eastern District of WI 517 E Wisconsin Ave, Rm 430 Milwaukee, WI 53202	Rebecca Garcia Chapter 13 Trustee PO Box 3170 Oshkosh, WI 54903
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Date: 4/4/2018

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Justine Swenson
Paralegal for Attorney Richard A. Check

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